

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JANET BAKER and JAMES BAKER,  
JKBAKER LLC and JIMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., S.A.)

Defendants.

Civil Action No.: 04-10501 (PBS)

GARY B. FILLER and LAWRENCE  
PERLMAN, Trustees of the TRA Rights  
Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., S.A.)

Defendants.

Civil Action No.: 04-10477 (PBS)

STONINGTON PARTNERS, INC., a  
Delaware Corporation, STONINGTON  
CAPITAL APPRECIATION 1994 FUND  
L.P., a Delaware Partnership and  
STONINGTON HOLDINGS, L.L.C., a  
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM  
(formerly known as ARTESIA BANKING  
CORP., S.A.)

Defendants.

Civil Action No.: 04-10411 (PBS)

**DEFENDANT DEXIA BANK BELGIUM'S  
MOTION TO COMPEL A COMPLETE RESPONSE TO ITS SECOND SET OF  
INTERROGATORIES TO BAKER, FILLER AND STONINGTON PLAINTIFFS**

Defendant Dexia Bank Belgium ("Dexia") respectfully requests that this Court compel a complete response from the Baker, Filler and Stonington Plaintiffs in these actions (collectively "Plaintiffs") to Dexia's interrogatory concerning amounts received by those Plaintiffs in settlement of claims arising from the L&H collapse. In support of this motion, Dexia submits the accompanying Memorandum of Law, and the accompanying Declaration of Thomas Teige Carroll.

WHEREFORE, Dexia requests that this motion to compel be granted in full.

**CERTIFICATION**

The undersigned counsel for Defendant Dexia Bank Belgium in the above-captioned actions hereby certifies that Dexia Bank Belgium has complied with the requirements of Federal Rule of Civil Procedure 37(a)(2)(B), and Local Rules 7.1(A)(2) and 37.1(B), by conferring with counsel for Plaintiffs concerning this issue on June 13, 2006. During this meet and confer,

counsel for Dexia and counsel for Plaintiffs were unable to come to any agreement. Participating in this meet and confer were Thomas Teige Carroll on behalf of Dexia; Avi Josefson on behalf of Stonington Plaintiffs and on behalf of TRA Rights Trust; and George Coe on behalf of the Baker Plaintiffs.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(D), Dexia respectfully requests to be heard at oral argument on this motion.

Dated: Boston, Massachusetts  
June 16, 2006

Respectfully submitted,

/s/ Breton Leone-Quick  
Peter M. Saparoff (BBO#441740)  
Breton Leone-Quick (BBO#655571)

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*Counsel for Dexia Bank Belgium, S.A.*

**Certificate of Service**

I, Breton Leone-Quick, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 16, 2006.

/s/ Breton Leone-Quick

Dated: June 16, 2006